

Thornton, Kecia

From: Fugh, Justina
Sent: Wednesday, February 21, 2018 4:33 PM
To: Thornton, Kecia
Subject: Re: Invitation ACC-TCC Hurricane Harvey Forum

The reason is that he got the invitation from his former employer. I can talk to him about this sort of invitation when I do his ethics briefing.

Sent from my iPhone

On Feb 21, 2018, at 4:28 PM, Thornton, Kecia <Thornton.Kecia@epa.gov> wrote:

Good afternoon Justina!

I hope you are well! I am reaching out, on behalf of Steven Cook, to ask if it's ok for him to attend the forum described below on March 5? He indicated that he would be there in listening mode only. Since he used to work for LyondellBasell Industries, who sent him the invitation on behalf of ACC and TCC, I

(b) (5)

EPA Region 6 is also attending; the RA is on the panel. Please let me know if you need additional information. Thank you!

Kecia
(202) 566-1913

From: Travis, Ann L [<mailto:Ann.Travis@lyondellbasell.com>]
Sent: Wednesday, February 21, 2018 2:24 PM
To: Cook, Steven <cook.steven@epa.gov>
Subject: Invitation ACC-TCC Hurricane Harvey Forum

Steven on behalf of the American Chemistry Council and the Texas Chemical Council, I would like to invite you to attend our Hurricane Harvey Forum, scheduled for Monday, March 5th. See invitation below.

Given your new position at EPA, the discussion will be quite relevant and an opportunity for you to meet a variety of stakeholders. We also are excited to have confirmed EPA Region 5 Administrator Anne Idsal as one of our panelists. .

I hope you can attend and please let me know if you have any questions.

Best,
Ann

Ann L. Travis
Director, Global Government Relations
LyondellBasell Industries
713-309-7568 - Direct
(b) (6) - Mobile

**The American Chemistry Council and
Texas Chemical Council**
Invite you to an industry forum discussing the lessons learned
from Hurricane Harvey

RESCHEDULED - NEW DATE

Please RSVP and join leaders from the Texas chemical industry and local, state and federal government officials as we explore ways we can enhance Gulf Coast resiliency, planning and response to future extreme weather events.

Featured Speaker:

Ted Cruz

United States Senator

Monday, March 5, 2018 8:00 a.m. - 3:00 p.m.

**Houston Area Safety Council Headquarters
5213 Center Street • Pasadena, Texas 77505**

* Registration will begin at 7:30 a.m.

Panels will discuss:

- Hurricane response from the perspective of chemical industry CEOs and manufacturing site operators.
- Lessons learned related to infrastructure, environment, information sharing, and coordination between the public and private sectors.
- Insights related to potential policy changes that can enhance future preparedness and response.

Please RSVP even if registered previously

To RSVP please contact events@sullivan-group.com



Thornton, Kecia

From: Fugh, Justina
Sent: Tuesday, March 13, 2018 6:58 PM
To: Brooks, Becky
Cc: Thornton, Kecia; Griffo, Shannon
Subject: RE: Speaking Invitation for Mr. Steven Cook

Hi Becky,

This note confirms our conversation earlier today. Steven Cook has been invited by the National Association of Chemical Distributors (NACD) to speak to them in his official EPA capacity on 4/26/18. NACD is a federally registered lobbyist, so he is prohibited by the ethics pledge that he signed from accepting any gift from them. If he is given any gift (t-shirt, ball cap, pen, mug) or if the event includes food, meal or a reception, then I will need to know in order to ascertain whether he may accept.

Mr. Cook's former employer, LyondellBasell, is a member of the NACD, but they have not invited him to speak. Instead, the invitation comes from the NACD, which is a different entity. He may accept the invitation to speak but may not engage in any "side bar" conversations with LyondellBasell on any particular matters that involve them as a specific entity.

OGC/Ethics typically waits to see the finalized public financial disclosure report before drafting a recusal statement. I'll send him a note to refresh my recollection about some of his changes and then maybe Shannon can get started on his recusal statement. That will help you and him.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Brooks, Becky
Sent: Tuesday, March 13, 2018 6:49 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Thornton, Kecia <Thornton.Kecia@epa.gov>
Subject: FW: Speaking Invitation for Mr. Steven Cook

Justina – Please see the attached invitation to Steven Cook from the National Association of Chemical Distributors (NACD). Would you have time today to chat a few minutes, perhaps at 1:30? I want to make sure I have a good understanding of when he can and can't meet w/folks in the chemical industry. (b) (5)

(b) (5)

Thank you. Becky

Becky Brooks
Special Assistant
Office of Land and Emergency Management
U.S. Environmental Protection Agency

From: Kenely, Caroline
Sent: Monday, March 12, 2018 2:41 PM
To: Cook, Steven <cook.steven@epa.gov>
Cc: Hilosky, Nick <Hilosky.Nick@epa.gov>; Brooks, Becky <Brooks.Becky@epa.gov>
Subject: FW: Speaking Invitation for Mr. Steven Cook

Caroline Kenely
Administrative Specialist for Office of Land & Emergency
Management – Immediate Office
WJC West – Rm 3146
202-566-2235

Live on Purpose!

From: Allison Tuszynski [<mailto:atuszynski@nacd.com>]
Sent: Monday, March 12, 2018 2:40 PM
To: Kenely, Caroline <Kenely.Caroline@epa.gov>
Subject: Speaking Invitation for Mr. Steven Cook

Ms. Kenely,

Thank you for your assistance on the phone. Please find attached an invitation letter for Mr. Steven Cook to speak to the members of the National Association of Chemical Distributors at our Annual Washington Fly-In on Thursday, April 26th.

Feel free to contact me by phone or email with any questions. We sincerely hope that Mr. Cook can participate.

Thank you,

Allison

Allison Tuszynski
Manager, Regulatory Affairs
National Association of Chemical Distributors (NACD)



1560 Wilson Blvd., Suite 1100
Arlington, VA 22209
(703) 527-6223 x 3069 – Main Line
(571) 482-3065 - Direct
atuszynski@nacd.com

Thornton, Kecia

From: Keith, Jennie
Sent: Tuesday, June 11, 2019 9:48 AM
To: Thornton, Kecia
Subject: RE: 31st Annual Superconference Agenda

Kecia,

The speaking engagement is good, but you should find out about the trip in general:

- 1) Does he plan to attend any other part of the conference (e.g., there is a reception on Thursday night prior to his speaking engagement)
- 2) What expenses is EPA expected to pay for? E.g., a registration fee
- 3) Are there other receptions hosted by other parties (not part of the agenda; separate from the conference) that he has received invitations to attend? And for which he needs ethics review
- 4) Review the travel itinerary in case your political is building this trip into a larger regional visit.

Thanks!

Jennie for OGC/Ethics

From: Thornton, Kecia
Sent: Wednesday, June 05, 2019 7:31 AM
To: Keith, Jennie <Keith.Jennie@epa.gov>
Subject: Fwd: 31st Annual Superconference Agenda

Good morning, Jennie!

Hope you are doing well! Just checking in to see if an Agency determination was made for this conference. I'd like to close the loop with our immediate office. Thank you so much!! Enjoy your day!

Kecia Thornton
OLEM/OMIS
(202) 566-1913

Begin forwarded message:

From: "Thornton, Kecia" <Thornton.Kecia@epa.gov>
Date: May 23, 2019 at 9:54:03 AM EDT
To: "Keith, Jennie" <Keith.Jennie@epa.gov>
Subject: 31st Annual Superconference Agenda

Thank you for taking a look at this. I will find out as much additional information as I can.
Thank you!

Thornton, Kecia

From: Fugh, Justina
Sent: Thursday, July 19, 2018 7:30 PM
To: Thornton, Kecia
Cc: Keith, Jennie
Subject: Re: questions

"Educational" is the right answer. Go ahead and do the ethics travel form.

Sent from my iPhone

On Jul 19, 2018, at 5:41 PM, Thornton, Kecia <Thornton.Kecia@epa.gov> wrote:

Oh Justina!

Since it's educational, does that change how we proceed? Should Steven still submit the ethics travel form? Thank you!!

Kecia Thornton
OLEM/OMIS
(202) 566-1913

On Jul 19, 2018, at 4:47 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Oh, rats, I just realized you said it's a "site visit." Is it part of an inspection or just an educational visit?

From: Thornton, Kecia
Sent: Thursday, July 19, 2018 4:45 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Keith, Jennie <Keith.Jennie@epa.gov>
Subject: RE: questions

Great! Thank you Justina! I will get this to him right away since his meeting is Monday. If the DEO forwards it, would tomorrow be enough time to receive a decision from your office? Thank you so much again! Take care!

Kecia
(202) 566-1913

From: Fugh, Justina
Sent: Thursday, July 19, 2018 4:40 PM
To: Thornton, Kecia <Thornton.Kecia@epa.gov>
Cc: Keith, Jennie <Keith.Jennie@epa.gov>
Subject: RE: questions

Hi Kecia,

Nope, I've been super crazy busy, so didn't even see your earlier message. Good that you sent a reminder. The answer is that Duke Energy is a federally registered lobbyist, so Steve Cook cannot accept any ride or other gift from them given the lobbyist gift ban. EPA should pay for the transportation and his meals since he is prohibited from accepting any gift from a lobbyist. That said, since he will be on travel status, then he can do an ethics travel form to ask OGC/Ethics to accept that gift for EPA. If you look for an email from me on 1/12/18, I explained how to complete the ethics travel form in this new age after Lotus Notes. Your DEO still has to sign it before it comes to OGC.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Thornton, Kecia
Sent: Thursday, July 19, 2018 4:35 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: FW: questions

Good afternoon Justina~

Don't mean to be a bother. Just wondering if, by chance, you responded directly to Steven Cook. (b) (6)

(b) (6) so I'm not sure if I missed something. Thank you!

Kecia

From: Thornton, Kecia
Sent: Wednesday, July 18, 2018 11:37 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: questions

Good morning Justina!

I hope you are well. I wanted to get your counsel on a couple of questions that have come my way. Steven Cook is traveling on Monday to do a site visit at a RCRA facility. The Duke Energy folks have offered to pick him up at the airport, so they can go do the site visit. Is that ok? Second question, Duke Energy is providing box lunches to have during the site visit. We believe the cost is about \$15 or less, but can confirm if needed. Can he accept the lunch or should he offer to pay?

Thank you for any advice you can offer. Take care!

Thornton, Kecia

From: Fugh, Justina
Sent: Monday, August 27, 2018 3:18 PM
To: Thornton, Kecia
Cc: ethics
Subject: RE: Meeting Request

Hi Kecia,

- 1) Yes, he may give the speech and, if he does so, then he is permitted to eat the meal offered to him pursuant to the gift exclusion at 5 CFR 2635.203(b)(8)(i). This exclusion applies even though the donor is a federally registered lobbyist.
- 2) We will soon launch invitations training for all political principals and their ethics staff, so you will be reminded how to answer these questions yourself, with us for back up.

Justina

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From: Thornton, Kecia
Sent: Monday, August 27, 2018 1:44 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: ethics <ethics@epa.gov>
Subject: FW: Meeting Request

Good afternoon, Justina!

I hope you had a wonderful weekend. Attached is additional information regarding the invitation Steven Cook received from AFPM. Please let me know your thoughts. Thank you very much!

Kecia
(202) 566-1913

From: Thornton, Kecia
Sent: Wednesday, August 22, 2018 11:42 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: FW: Meeting Request

Good morning, Justina!

I hope all is well with you. I am checking to see if I am on the right track for giving advice on an invitation request received by Steven Cook (see further down below.) Steven has been invited as a guest speaker at the American Fuel & Petrochemical Manufacturers (AFPM) legal committee dinner in October. I found that AFPM is a federally registered lobbyist. Since this is a local event and AFPM is a federally registered lobbyist,

(b) (5) Thank you
for your input!

p.s. In the future, should I send these types of inquiries to the "ethics" community email or still directly to you?
Thank you!

Kecia
(202) 566-1913

From: Richard Moskowitz [<mailto:RMoskowitz@afpm.org>]
Sent: Tuesday, August 21, 2018 9:15 AM
To: Cook, Steven <cook.steven@epa.gov>
Cc: Taylor Hoverman <THoverman@afpm.org>; Maggie O'Connell <MOConnell@afpm.org>
Subject: Meeting Request

Steven,

We would like to invite you to be our speaker at the AFPM Legal Committee dinner on October 1st. The committee would like you to address the Superfund Task Force and other lessons learned.

We can discuss the details at your convenience. Thank you for your consideration.

-Rich

Richard Moskowitz
General Counsel

American
Fuel & Petrochemical
Manufacturers
1800 M Street, NW
Suite 900 North
Washington, DC 20036

202.844.5474 direct
202.457.0480 office

rmoskowitz@afpm.org
Learn more about AFPM, at afpm.org

CONFIDENTIALITY NOTICE: This electronic message contains information from the American Fuel & Petrochemical Manufacturers that may be confidential or privileged. The information is intended solely for the use of the individual(s) or entity(ies) named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please notify us immediately by telephone at (202) 457-0480 or by reply e-mail and permanently delete this e-mail, any attachments, and all copies thereof.

From: [Fugh, Justina](#)
To: [Beck, Nancy](#); [Bolen, Brittany](#); [Cook, Steven](#); [Darwin, Henry](#); [Fotouhi, David](#); [Gunasekara, Mandy](#); [Schwab, Justin](#); [Wagner, Kenneth](#); [Wehrum, Bill](#); [Wildeman, Anna](#); [Woods, Clint](#); [Wright, Peter](#)
Subject: Ethics advice concerning your invitation to the ELI dinner
Date: Wednesday, August 29, 2018 2:12:00 PM

Hi there,

OGC/Ethics understands that you have received or will soon receive an invitation from the Environmental Law Institute (ELI) to be its guest at its annual awards dinner to be held this year on October 23, 2018 at the Omni Shoreham Hotel. I am writing to confirm that, if you decide to attend this event, you may do so consistent with the Standards of Ethical Conduct for Employees of the Executive Branch and the Trump ethics pledge that you signed (if you were required to do so).

This event qualifies for the Widely-Attended-Gathering gift exception and the donor is not a federally registered lobbyist. Thus, OGC/Ethics determines that your attendance at the event is in the Agency's interest because it will further agency programs and operations. Should you attend this event, you will NOT be required to report this as a gift on your financial disclosure report form because the gift is valued at \$275, which is BELOW the reporting threshold.

Please note: this approval applies only to invitations from ELI itself. Any invitations from other sources will require separate determinations by either OGC or the appropriate Deputy Ethics Official. This determination covers you only -- the invitation is not transferable and is not intended for more than just one attendee.

Acceptance of Free Attendance to a Dinner and Fundraiser (WAG rule)

The gift offered is an evening reception and dinner sponsored by ELI. Because the organization is offering you a complimentary ticket, we must analyze it according to the gift rules. Generally, federal employees are prohibited from accepting gifts given because of their official position or given by a prohibited source (typically, a person either regulated by or seeking to do business with the EPA). In this instance, the gift of free attendance is offered to you because of your official position. In analyzing the situation, we determined that the WAG exception is available because the reception will be widely attended, there will be a diversity of views represented, and there is an opportunity for the exchange of ideas. In order to utilize this gift exception, OGC/Ethics must also make a written determination that we believe your attendance is in the Agency's interest. We do, in fact, conclude that there is an Agency interest in your attendance if you wish to go.

Limitations Due to the Fundraiser Event

Please note that this event is a fundraiser. Therefore, ELI cannot use or reference your official position or title or any authority associated with your public office in furtherance of the

fundraising effort. You may not actively or visibly participate in the promotion, production, or presentation of the event, which means that you cannot sit at a head table nor stand in a receiving line. We have confirmed with ELI that you will be placed by ELI and not seated at the request of any sponsoring entity that has bought a table.

Please let me know if you have any questions.

Regards,

justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Keith, Jennie](#)
To: [Thornton, Kecia](#)
Cc: [Breen, Barry](#); [Simon, Nigel](#)
Subject: FW: Ethics Travel for Steven Cook (Travel Start Date 7/23/2018)
Date: Monday, July 23, 2018 12:54:00 PM
Attachments: [Cook July 23 2018 Ethics Travel Form.pdf](#)

Kecia,

When this is rescheduled, we do need a few changes to the ethics travel form, attached here.

1. (b) (5)
[Redacted]
2. (b) (5)
[Redacted]
3. (b) (5)
[Redacted]
- (b) (5)
[Redacted]

Thanks!

Jennie for OGC/Ethics

From: Breen, Barry
Sent: Friday, July 20, 2018 12:30 PM
To: ethics <ethics@epa.gov>
Cc: Thornton, Kecia <Thornton.Kecia@epa.gov>; Fugh, Justina <Fugh.Justina@epa.gov>; Keith, Jennie <Keith.Jennie@epa.gov>; Simon, Nigel <Simon.Nigel@epa.gov>; Hilosky, Nick <Hilosky.Nick@epa.gov>; Cook, Steven <cook.steven@epa.gov>
Subject: Ethics Travel for Steven Cook (Travel Start Date 7/23/2018)
Nigel is on leave, so I reviewed this myself.
Barry Breen

From: Cook, Steven
Sent: Friday, July 20, 2018 10:48 AM
To: Breen, Barry <Breen.Barry@epa.gov>
Cc: Simon, Nigel <Simon.Nigel@epa.gov>; Hilosky, Nick <Hilosky.Nick@epa.gov>
Subject: FW: Ethics form for Steven Cook to complete as soon as possible today!
FOR Barry: The Deputy Ethics Official will then review the request. Then, if the DEO has no concerns or changes, the DEO will forward the email and attachment to ethics@epa.gov with a cc to Jennie Keith and Kecia Thornton. Since this is time sensitive, it might be a good idea to

cc: Justina Fugh as well. The subject line should read as follows: Ethics Travel for **TRAVELER'S NAME (TRAVEL START DATE)**.

Thanks!

Steven

From: Hilosky, Nick

Sent: Friday, July 20, 2018 10:28 AM

To: Cook, Steven <cook.steven@epa.gov>

Subject: FW: Ethics form for Steven Cook to complete as soon as possible today!

Steven,

Here is the form so you have...needs to be done and transmitted electronically. Barry can sign instead of Nigel.

Nick

From: Thornton, Kecia

Sent: Friday, July 20, 2018 7:21 AM

To: Brooks, Becky <Brooks.Bekky@epa.gov>

Cc: Hilosky, Nick <Hilosky.Nick@epa.gov>

Subject: Ethics form for Steven Cook to complete as soon as possible today!

Good morning, Becky and Nick!

Justina is good with the answer "educational". She is asking us to have Steven complete the ethics travel form (please see her response below.) Once he completes it, the form should be emailed to Nigel since he is acting DEO. Nigel will then need to forward it to the ethics email box immediately. In his email, he should let OGC know that decision is needed today since the visit is scheduled for Monday. I can send Nigel a heads up email if you think that would be helpful or please feel free to share this email with him.

Instructions for Steven to complete the form are below. Please let me know if you have any questions or if there is anything I can do to help.

1) BEFORE THE TRIP, the employee needs to complete the fillable form (attached).
2) The employee then forwards the form via email to the OLEM Deputy Ethics Official (Nigel Simon). OGC/Ethics will accept the forwarded email from the employee's email account in lieu of seeing a signature (in other words, there is no need for Steven to actually sign a printed page).

3) **FOR NIGEL:** The Deputy Ethics Official will then review the request. Then, if the DEO has no concerns or changes, the DEO will forward the email and attachment to ethics@epa.gov with a cc to Jennie Keith. Since this is time sensitive, it might be a good idea to cc: Justina Fugh as well. The subject line should read as follows: Ethics Travel for **TRAVELER'S NAME (TRAVEL START DATE)**.

4) Hopefully today, Jennie will review the form and then input them into the system. She will respond back to both the DEO and the traveler with approvals and/or questions for follow up, and attach a pdf of the final approval form for the voucher.

I notified Justina that we needed a decision from her office today. Since the approvals do not come to me, I will not know when and if they respond to the traveler (Steven). I am happy to follow up with the ethics team later today if needed. Thank you!

Kecia

(202) 566-1913

From: Fugh, Justina

Sent: Thursday, July 19, 2018 4:40 PM

To: Thornton, Kecia <Thornton.Kecia@epa.gov>

Cc: Keith, Jennie <Keith.Jennie@epa.gov>

Subject: RE: questions

Hi Kecia,

Nope, I've been super crazy busy, so didn't even see your earlier message. Good that you sent a reminder. The answer is that Duke Energy is a federally registered lobbyist, so Steve Cook cannot accept any ride or other gift from them given the lobbyist gift ban. EPA should pay for the transportation and his meals since he is prohibited from accepting any gift from a lobbyist. That said, since he will be on travel status, then he can do an ethics travel form to ask OGC/Ethics to accept that gift for EPA. If you look for an email from me on 1/12/18, I explained how to complete the ethics travel form in this new age after Lotus Notes. Your DEO still has to sign it before it comes to OGC.

Justina

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From: Thornton, Kecia

Sent: Thursday, July 19, 2018 4:35 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: FW: questions

Good afternoon Justina~

Don't mean to be a bother. Just wondering if, by chance, you responded directly to Steven Cook. (b) (6), so

I'm not sure if I missed something. Thank you!

Kecia

From: Thornton, Kecia

Sent: Wednesday, July 18, 2018 11:37 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: questions

Good morning Justina!

I hope you are well. I wanted to get your counsel on a couple of questions that have come my way. Steven Cook is traveling on Monday to do a site visit at a RCRA facility. The Duke Energy folks have offered to pick him up at the airport, so they can go do the site visit. Is that ok? Second question, Duke Energy is providing box lunches to have during the site visit. We believe the cost is about \$15 or less, but can confirm if needed. Can he accept the lunch or should he offer to pay?

Thank you for any advice you can offer. Take care!

Kecia

(202) 566-1913

From: [Cook, Steven](#)
To: [Fugh, Justina](#)
Subject: RE: Are you speaking at a conference sponsored by Manko on 12/19?
Date: Sunday, November 18, 2018 8:37:09 AM

Thanks for the review and follow up.

From: Fugh, Justina
Sent: Friday, November 16, 2018 4:29 PM
To: Cook, Steven <cook.steven@epa.gov>
Subject: RE: Are you speaking at a conference sponsored by Manko on 12/19?

Hi Steven,

Thanks for the information! (b) (5)

[REDACTED]

[REDACTED] Say howdy to him for me!

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Cook, Steven
Sent: Wednesday, November 14, 2018 12:57 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: Are you speaking at a conference sponsored by Manko on 12/19?
I am aware of it. (b) (5)

[REDACTED]

Sent from my iPhone

On Nov 14, 2018, at 10:35 AM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi there,

(b) (5)

[REDACTED]

Does this strike any bells with you? And, if so, do you have any

more details about the speaking invitation?

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [Cook, Steven](#)
Cc: [Smith, William \(Region 3\)](#)
Subject: RE: Are you speaking at a conference sponsored by Manko on 12/19?
Date: Tuesday, November 27, 2018 10:39:00 AM

Hi there,

Well, I wrote to Mark Gold on Monday of last week, but have yet to hear back from him with any confirmation that the attendees will not be limited to firm clients. I have sent him a reminder note asking to hear back by COB tomorrow. I've copied Bill Smith, who is a regional ethics counselor to Cosmo Servidio to let him know the status as well.

(b) (5) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Fugh, Justina
Sent: Friday, November 16, 2018 4:29 PM
To: Cook, Steven <cook.steven@epa.gov>
Subject: RE: Are you speaking at a conference sponsored by Manko on 12/19?

Hi Steven,

Thanks for the information! (b) (5) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Say howdy to him for me!

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Cook, Steven
Sent: Wednesday, November 14, 2018 12:57 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: Are you speaking at a conference sponsored by Manko on 12/19?

I am aware of it. (b) (5) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Sent from my iPhone

On Nov 14, 2018, at 10:35 AM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi there,

(b) (5) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] Does this strike any bells with you? And, if so, do you have any more details about the speaking invitation?

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Cook, Steven](#)
To: [Fugh, Justina](#)
Cc: [Smith, William \(Region 3\)](#)
Subject: Re: confirmation from Marc Gold
Date: Tuesday, November 27, 2018 4:34:24 PM

I concur with your assessment.

Sent from my iPhone

On Nov 27, 2018, at 1:12 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi Steve,

EPA received the message below from Marc Gold. (b) (5)

Region 3 joins me in concluding that this event is not for his firm's business development only.

Justina

... from Marc Gold on 11/27/18 ...

We agreed to organize this workshop with Mr. Cook to facilitate a discussion of EPA's Superfund initiatives with members of the regulated community to provide a forum for an exchange of ideas. We are inviting in-house counsel who represent entities involved in Superfund matters – some are clients and some are not. In addition, we are inviting many outside lawyers who are not affiliated with our firm. All of these lawyers have Superfund practices and are very familiar with the innovations that now are being considered to improve the process. The goal is to have a smaller group to facilitate an interactive discussion. Regional Administrator Servidio was invited because Mr. Cook was interested in having the Region participate and we agree that it would be great if he is able to attend. In sum, this workshop is designed to enable attendees to discuss EPA's innovative strategies with Mr. Cook and to offer ideas and suggestions from the PRP perspective for overcoming pitfalls that may impede the prompt remediation of Superfund sites. We believe that the workshop format is consistent with what we understand is EPA's continued interest in engaging with all stakeholders on these important matters. Please let me know if you have any further questions or need any additional information about the workshop. Thank you.

Regards, Marc

Marc E. Gold, Esquire

MANKO | GOLD | KATCHER | FOX LLP

An environmental, energy, litigation, safety and land use law practice

401 City Avenue, Suite 901 | Bala Cynwyd, PA 19004

(w) 484.430.2301 | (m) (b) (6) | (f) 484.430.5711

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mgold@mankogold.com | www.mankogold.com

From: Fugh, Justina

Sent: Tuesday, November 27, 2018 10:39 AM

To: Cook, Steven <cook.steven@epa.gov>

Cc: Smith, William (Region 3) <smith.william@epa.gov>

Subject: RE: Are you speaking at a conference sponsored by Manko on 12/19?

Hi there,

Well, I wrote to Mark Gold on Monday of last week, but have yet to hear back

from him with any confirmation that the attendees will not be limited to firm clients. I have sent him a reminder note asking to hear back by COB tomorrow. I've copied Bill Smith, who is a regional ethics counselor to Cosmo Servidio to let him know the status as well.

(b) (5)

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Fugh, Justina

Sent: Friday, November 16, 2018 4:29 PM

To: Cook, Steven <cook.steven@epa.gov>

Subject: RE: Are you speaking at a conference sponsored by Manko on 12/19?

Hi Steven,

Thanks for the information! (b) (5)

Say howdy to him for me!

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Cook, Steven

Sent: Wednesday, November 14, 2018 12:57 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Re: Are you speaking at a conference sponsored by Manko on 12/19?

I am aware of it. (b) (5)

Sent from my iPhone

On Nov 14, 2018, at 10:35 AM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi there,

(b) (5)

(b) (5)

Does this strike any bells with you? And, if so, do you have any more details about the speaking invitation?

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [Smith, William \(Region 3\)](#)
Subject: RE: question for you from EPA Ethics
Date: Tuesday, November 27, 2018 3:01:00 PM

So it's really due to your gentle nudge that he responded. Thanks!

(b) (5)

From: Smith, William (Region 3)
Sent: Tuesday, November 27, 2018 2:59 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: question for you from EPA Ethics

*****CONFIDENTIAL ATTORNEY COMMUNICATION - May be FOIA exempt*****

(b) (5)

William C. Smith
Senior Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency, Region III
smith.william@epa.gov
Mailcode 3RC00
215-814-2690 (phone)
215-814-2603 (fax)

From: Fugh, Justina
Sent: Tuesday, November 27, 2018 2:52 PM
To: Smith, William (Region 3) <smith.william@epa.gov>
Subject: FW: question for you from EPA Ethics
Heh heh heh. Amazing what a little prodding can do.
(b) (5) You?

From: Marc Gold [<mailto:MGold@mankogold.com>]
Sent: Tuesday, November 27, 2018 2:32 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Smith, William (Region 3) <smith.william@epa.gov>
Subject: RE: question for you from EPA Ethics

Justina,
Thank you for your follow-up email. Sorry, my response was delayed as a result of the holiday.

We agreed to organize this workshop with Mr. Cook to facilitate a discussion of EPA's Superfund initiatives with members of the regulated community to provide a forum for an exchange of ideas. We are inviting in-house counsel who represent entities involved in Superfund matters – some are clients and some are not. In addition, we are inviting many outside lawyers who are not affiliated with our firm. All of these lawyers have Superfund practices and are very familiar with the innovations that now are being considered to improve the process. The goal is to have a smaller group to facilitate an interactive discussion. Regional Administrator Servidio was invited because Mr. Cook was interested in having the Region participate and we agree that it would be great if he is able to attend.

In sum, this workshop is designed to enable attendees to discuss EPA's innovative strategies with Mr. Cook and to offer ideas and suggestions from the PRP perspective for overcoming pitfalls that may impede the prompt remediation of Superfund sites. We believe that the workshop format is consistent with what we understand is EPA's continued interest in engaging with all stakeholders on these important matters. Please let me know if you have any further questions or need any additional information about the workshop. Thank you.

Regards, Marc

Marc E. Gold, Esquire

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From: Fugh, Justina [<mailto:Fugh.Justina@epa.gov>]

Sent: Tuesday, November 27, 2018 10:35 AM

To: 'MGold@mankogold.com'

Cc: Smith, William (Region 3) <smith.william@epa.gov>

Subject: FW: question for you from EPA Ethics

Dear Mr. Gold,

I wrote to you last week (see below), but as yet have not received any reply. I am writing again in hopes of hearing from you by COB tomorrow. I am still awaiting confirmation from you that you are attempting to secure co-sponsorship with the local bar association and/or opening the event to more than your own clients. I will notify Messrs. Cook and Servidio that we are still waiting for further information from you. Lacking that, I am afraid that I can't yet allow them to attend in their official capacities. Should I not hear from you by COB tomorrow, I will have to conclude that you are no longer interested in having any EPA speakers at your event.

Sincerely yours,

Justina Fugh

Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Fugh, Justina

Sent: Monday, November 19, 2018 4:56 PM

To: 'MGold@mankogold.com' <MGold@mankogold.com>

Subject: question for you from EPA Ethics

Hi there,

My name is Justina Fugh, and I'm the Director of the Ethics Law Office here at EPA. I'm writing to follow up with you, please, on an invitation that your law firm extended to at least two EPA political appointees, Steven Cook and Cosmo Servidio. As you know, Mr. Servidio is the Regional Administrator in Region 3, and his ethics counselors were reviewing an invitation from your firm, Manko Gold, to speak at an "invitation only" conference on 12/19. They reached out to me, indicating that Mr. Cook had similarly been invited to speak.

Generally speaking, we frown on having EPA employees serve as free faculty to a for-profit entity if the event is for business development reasons only. So I asked Steven Cook about his understanding of the event. He indicated that he thought the audience would be more than just your client base and that, further, you may be having a local bar association co-sponsor the event. Have you made any progress toward obtaining a co-sponsor, or can you provide any assurances that the event is broader than just your own clients?

Any information you can provide will help us ascertain whether we raise any ethics issues for the potential EPA speakers. I'll be away from the office this week, but will inevitably be checking email occasionally. Thanks in advance for help or insights you can provide!

Cheers,

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Cook, Steven](#)
To: [Fugh, Justina](#)
Subject: RE: Filing period
Date: Saturday, March 02, 2019 4:04:31 PM

I revised and re-submitted. Thanks for the help.

From: Fugh, Justina
Sent: Wednesday, February 27, 2019 1:55 PM
To: Cook, Steven <cook.steven@epa.gov>
Cc: ethics <ethics@epa.gov>
Subject: RE: Filing period
[Ha! love the confidence! Sending it back to you now.](#)

From: Cook, Steven
Sent: Wednesday, February 27, 2019 1:52 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: ethics <ethics@epa.gov>
Subject: Re: Filing period
Ok - guessed wrong on a couple of these. Can someone send the report back to me to fix it? I was overconfident that I got it right and hit the submit button.

Sent from my iPhone

On Feb 27, 2019, at 11:58 AM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi there,

The reporting periods for the OGE Form 278e vary depending on the type of report being filed. This time, you're filing the annual report, so here is the chart to follow. Yes,

(b) (6)

Part	Annual
1. Filer's Positions Held Outside United States Government	Preceding Calendar Year to Filing Date
2. Filer's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year
3. Filer's Employment Agreements and Arrangements	Preceding Calendar Year to Filing Date
4. Filer's Sources of Compensation Exceeding \$5,000 in a Year	N/A – Leave this Part blank
5. Spouse's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year
6. Other Assets and Income	Preceding Calendar Year

7. Transactions	Preceding Calendar Year ²
8. Liabilities	Preceding Calendar Year
9. Gifts and Travel Reimbursements	Preceding Calendar Year ³

2. Filers do not need to include any period when they were not a public financial disclosure filer or an employee of the United States Government.

3. Filers do not need to include any period when they were not an employee of the United States Government.

Call if you need more help! This is a super aggravating requirement, I know!

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Cook, Steven

Sent: Saturday, February 23, 2019 5:14 PM

To: ethics <ethics@epa.gov>

Subject: Filing period

What period is the employment income supposed to cover – calendar year 2018? (b)

(b) Do I need to report that? I think that the last update I did of this ethics report I covered (b) (6)

(b) Do I just report what came in after that point?

Steven Cook

Deputy Assistant Administrator

Office of Land and Emergency Management

U.S. Environmental Protection Agency

From: [Fugh, Justina](#)
To: [Cook, Steven](#)
Subject: RE: Financial Disclosure Report
Date: Tuesday, March 13, 2018 7:28:00 PM
Attachments: [image001.png](#)

Yes: (b) (6)

[REDACTED] All that's left is the ethics pledge restriction against working with your former employer.

From: Cook, Steven
Sent: Tuesday, March 13, 2018 7:08 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Financial Disclosure Report

(b) (5), (b) (6)

[REDACTED]

From: Fugh, Justina
Sent: Tuesday, March 13, 2018 7:04 PM
To: Cook, Steven <cook.steven@epa.gov>
Subject: RE: Financial Disclosure Report

That pesky junk folder! Glad you found the email. Here is the pdf of your report as currently reflected in INTEGRITY in case it's helpful. (b) (5), (b) (6)

[REDACTED]

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North William Jefferson Clinton Federal Building | Washington DC 20460 (for ground deliveries use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Cook, Steven
Sent: Tuesday, March 13, 2018 10:13 AM
To: Ross, Margaret <Ross.Margaret@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Financial Disclosure Report: Log in to INTEGRITY

Never mind – I found it in my junk folder

From: Cook, Steven
Sent: Tuesday, March 13, 2018 9:13 AM
To: Ross, Margaret <Ross.Margaret@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Financial Disclosure Report: Log in to INTEGRITY

I am not making much progress with the system. It says it has sent an email with a link to create a new password but none has shown up. I tried yesterday and this morning. Any thoughts?

From: Ross, Margaret
Sent: Monday, February 26, 2018 12:18 PM
To: Cook, Steven <cook.steven@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Financial Disclosure Report: Log in to INTEGRITY

Hi Steve,

Please see below for instructions on how to log into INTEGRITY to complete your New Entrant Report.

Your User ID is: (b) (6)

When you log in for the first time, select **Forgot, Set, or Change Your Password** on the *Integrity* login page:



MAX will send you an email with a link to set your password. Once their password has been set you can return to the *Integrity* login page using your email address as their username and the newly set password.

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building Room 4310A North | Washington, DC 20460 (for ground deliveries: 20004) | phone 202-564-3221

From: [Fugh, Justina](#)
To: [Cook, Steven](#)
Subject: RE: Financial Disclosure Report
Date: Tuesday, March 13, 2018 7:03:00 PM
Attachments: [Cook Steve new entrant report.pdf](#)
[image001.png](#)

That pesky junk folder! Glad you found the email. Here is the pdf of your report as currently reflected in INTEGRITY in case it's helpful. (b) (5), (b) (6)

[REDACTED]

[REDACTED]

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North William Jefferson Clinton Federal Building | Washington DC 20460 (for ground deliveries use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Cook, Steven
Sent: Tuesday, March 13, 2018 10:13 AM
To: Ross, Margaret <Ross.Margaret@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Financial Disclosure Report: Log in to INTEGRITY
Never mind – I found it in my junk folder

From: Cook, Steven
Sent: Tuesday, March 13, 2018 9:13 AM
To: Ross, Margaret <Ross.Margaret@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Financial Disclosure Report: Log in to INTEGRITY
I am not making much progress with the system. It says it has sent an email with a link to create a new password but none has shown up. I tried yesterday and this morning. Any thoughts?

From: Ross, Margaret
Sent: Monday, February 26, 2018 12:18 PM
To: Cook, Steven <cook.steven@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Financial Disclosure Report: Log in to INTEGRITY
Hi Steve,
Please see below for instructions on how to log into INTEGRITY to complete your New Entrant Report.
Your User ID is: (b) (6)
When you log in for the first time, select **Forgot, Set, or Change Your Password** on the *Integrity* login page:



MAX will send you an email with a link to set your password. Once their password has been set you can return to the *Integrity* login page using your email address as their username and the newly set password.

Margaret Ross | Ethics Officer | Office of General Counsel | US EPA | William Jefferson Clinton Federal Building Room 4310A North | Washington DC 20460 (for ground deliveries: 20004) | phone 202-564-3221

From: [Fugh, Justina](#)
To: [Cook, Steven](#)
Cc: [Ross, Margaret](#); [Duross, Jeanne](#)
Subject: RE: Integrity.gov: Report Returned
Date: Sunday, April 08, 2018 11:07:00 PM

Hi Steven,

I'm slowly slogging through accumulated emails (last week was kind of brutal for EPA Ethics). I'm writing to confirm that now that (b) (6), (b) (5)

Shannon Griffo would have worked on your recusal statement, but (b) (6)! So Jeanne Duross or I will send you a draft soon. Sorry for being tardy!
Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

-----Original Message-----

From: Cook, Steven
Sent: Wednesday, March 28, 2018 2:40 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Ross, Margaret <Ross.Margaret@epa.gov>
Subject: RE: Integrity.gov: Report Returned

I have completed my updates on the financial disclosure forms and have resubmitted it.

Also, (b) (6), (b) (5)

Please let me know if you have any questions or need more information.

Steven

-----Original Message-----

From: Integrity.gov [mailto:notifications@integrity.gov]
Sent: Wednesday, March 28, 2018 9:37 AM
To: Cook, Steven <cook.steven@epa.gov>
Cc: Ross, Margaret <Ross.Margaret@epa.gov>
Subject: Integrity.gov: Report Returned

Dear Cook, Steven,

Ross, Margaret has requested that you amend your 2017 New Entrant Report filed 12/9/2017. You may access the report by logging into Integrity at www.integrity.gov.

From: [Cook, Steven](#)
To: [Fugh, Justina](#)
Subject: Re: Need to discuss a possible trip to visit a CCR impoundment on Monday
Date: Friday, July 20, 2018 9:57:04 AM

Great. My assistants were also working on it. We will strive to do this sooner in the process - those were really good messages last night.

Sent from my iPhone

On Jul 20, 2018, at 8:58 AM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hey — thanks for asking and Kecia is already on it! My office plans to accept the gift of the ride and the lunch using the ethics travel form that Kecia will send to us today.

Justina

Sent from my iPhone

On Jul 19, 2018, at 10:46 PM, Cook, Steven <cook.steven@epa.gov> wrote:

Just caught up with this. I am supposed to go to Wilmington NC to tour a coal ash impoundment and reuse project at Duke Energy. They are planning to pick me up at the airport along with their DC rep to take us to the site. I am up and back same day. I assume I need to pay for the box lunch we having at the site. Can I do the car ride is my first question.

Sent from my iPhone

On Jul 19, 2018, at 7:25 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Can you call me now on my epa cell? It's 202-731-3631. I will be in my wolf trap seat in about 15 minutes so if not soon then maybe tomorrow?

Sent from my iPhone

On Jul 19, 2018, at 6:12 PM, Cook, Steven <cook.steven@epa.gov> wrote:

Justina – I have some questions about a potential trip on Monday to a company's utility plant to discuss coal ash handling and surface impoundments. Are you available to discuss?

Steven Cook
Deputy Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency

From: [Keith, Jennie](#)
To: [Thornton, Kecia](#)
Subject: RE: PLEASE DISREGARD: Ethics Travel for Steven Cook (Travel Start Date 7/23/2018)
Date: Monday, July 23, 2018 11:45:00 AM

Great, I'll take a look at the form; and if I have any items that need more information/revision, I'll let you know. But, if you don't hear back from me, assume we're good! Thanks! Jennie for OGC/Ethics

From: Thornton, Kecia
Sent: Monday, July 23, 2018 11:44 AM
To: Keith, Jennie <Keith.Jennie@epa.gov>; ethics <ethics@epa.gov>
Subject: RE: PLEASE DISREGARD: Ethics Travel for Steven Cook (Travel Start Date 7/23/2018)
Thank you Jennie!

He is postponing the trip so as soon as we have the new date, we will have the DEO resubmit the request. Take care!

Kecia
(202) 566-1913

From: Keith, Jennie
Sent: Monday, July 23, 2018 11:42 AM
To: Thornton, Kecia <Thornton.Kecia@epa.gov>; ethics <ethics@epa.gov>
Subject: RE: PLEASE DISREGARD: Ethics Travel for Steven Cook (Travel Start Date 7/23/2018)
Thank you for the notice, I'll make sure we don't process it. Thanks! Jennie for OGC/Ethics

From: Thornton, Kecia
Sent: Monday, July 23, 2018 8:47 AM
To: ethics <ethics@epa.gov>
Cc: Keith, Jennie <Keith.Jennie@epa.gov>; Fugh, Justina <Fugh.Justina@epa.gov>
Subject: PLEASE DISREGARD: Ethics Travel for Steven Cook (Travel Start Date 7/23/2018)
Steven Cook did not take the trip. Thank you and have a great day!

Kecia Thornton
OLEM/OMIS
(202) 566-1913

Begin forwarded message:

From: "Thornton, Kecia" <Thornton.Kecia@epa.gov>
Date: July 23, 2018 at 8:26:50 AM EDT
To: ethics <ethics@epa.gov>
Cc: "Keith, Jennie" <Keith.Jennie@epa.gov>, "Fugh, Justina" <Fugh.Justina@epa.gov>
Subject: FW: Ethics Travel for Steven Cook (Travel Start Date 7/23/2018)

Good morning!

Just following up on Barry Breen's email from Friday. It may be too late since today is the travel date. I'm guessing that Steven will need to pay for transportation and meals since he does not have OGC approval, correct? Thank

you and so sorry for the last minute urgency. Take care!

Kecia

(202) 566-1913

From: Breen, Barry

Sent: Friday, July 20, 2018 12:30 PM

To: ethics <ethics@epa.gov>

Cc: Thornton, Kecia <Thornton.Kecia@epa.gov>; Fugh, Justina <Fugh.Justina@epa.gov>; Keith, Jennie <Keith.Jennie@epa.gov>; Simon, Nigel <Simon.Nigel@epa.gov>; Hilosky, Nick <Hilosky.Nick@epa.gov>; Cook, Steven <cook.steven@epa.gov>

Subject: Ethics Travel for Steven Cook (Travel Start Date 7/23/2018)

Nigel is on leave, so I reviewed this myself.

Barry Breen

From: Cook, Steven

Sent: Friday, July 20, 2018 10:48 AM

To: Breen, Barry <Breen.Barry@epa.gov>

Cc: Simon, Nigel <Simon.Nigel@epa.gov>; Hilosky, Nick <Hilosky.Nick@epa.gov>

Subject: FW: Ethics form for Steven Cook to complete as soon as possible today!

FOR Barry: The Deputy Ethics Official will then review the request. Then, if the DEO has no concerns or changes, the DEO will forward the email and attachment to ethics@epa.gov with a cc to Jennie Keith and Kecia Thornton. Since this is time sensitive, it might be a good idea to cc: Justina Fugh as well. The subject line should read as follows: Ethics Travel for **TRAVELER'S NAME (TRAVEL START DATE)**.

Thanks!

Steven

From: Hilosky, Nick

Sent: Friday, July 20, 2018 10:28 AM

To: Cook, Steven <cook.steven@epa.gov>

Subject: FW: Ethics form for Steven Cook to complete as soon as possible today!

Steven,

Here is the form so you have...needs to be done and transmitted electronically. Barry can sign instead of Nigel.

Nick

From: Thornton, Kecia

Sent: Friday, July 20, 2018 7:21 AM

To: Brooks, Becky <Brooks.Becky@epa.gov>

Cc: Hilosky, Nick <Hilosky.Nick@epa.gov>

Subject: Ethics form for Steven Cook to complete as soon as possible today!

Good morning, Becky and Nick!

Justina is good with the answer "educational". She is asking us to have Steven complete the ethics travel form (please see her response below.) Once he completes it, the form should be emailed to Nigel since he is acting DEO. Nigel will then need to forward it to the ethics email box immediately. In his email, he should let OGC know that decision is needed today since the visit is scheduled for Monday. I can send Nigel a heads up email if you think that would be helpful or

please feel free to share this email with him.

Instructions for Steven to complete the form are below. Please let me know if you have any questions or if there is anything I can do to help.

1) BEFORE THE TRIP, the employee needs to complete the fillable form (attached).

2) The employee then forwards the form via email to the OLEM Deputy Ethics Official (Nigel Simon). OGC/Ethics will accept the forwarded email from the employee's email account in lieu of seeing a signature (in other words, there is no need for Steven to actually sign a printed page).

3) **FOR NIGEL:** The Deputy Ethics Official will then review the request. Then, if the DEO has no concerns or changes, the DEO will forward the email and attachment to ethics@epa.gov with a cc to Jennie Keith. Since this is time sensitive, it might be a good idea to cc: Justina Fugh as well. The subject line should read as follows: Ethics Travel for **TRAVELER'S NAME (TRAVEL START DATE)**.

4) Hopefully today, Jennie will review the form and then input them into the system. She will respond back to both the DEO and the traveler with approvals and/or questions for follow up, and attach a pdf of the final approval form for the voucher.

I notified Justina that we needed a decision from her office today. Since the approvals do not come to me, I will not know when and if they respond to the traveler (Steven). I am happy to follow up with the ethics team later today if needed. Thank you!

Kecia

(202) 566-1913

From: Fugh, Justina

Sent: Thursday, July 19, 2018 4:40 PM

To: Thornton, Kecia <Thornton.Kecia@epa.gov>

Cc: Keith, Jennie <Keith.Jennie@epa.gov>

Subject: RE: questions

Hi Kecia,

Nope, I've been super crazy busy, so didn't even see your earlier message. Good that you sent a reminder. Than answer is that Duke Energy is a federally registered lobbyist, so Steve Cook cannot accept any ride or other gift from them given the lobbyist gift ban. EPA should pay for the transportation and his meals since he is prohibited from accepting any gift from a lobbyist. That said, since he will be on travel status, then he can do an ethics travel form to ask OGC/Ethics to accept that gift for EPA. If you look for an email from me on 1/12/18, I explained how to complete the ethics travel form in this new age after Lotus Notes. Your DEO still has to sign it before it comes to OGC.

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Thornton, Kecia

Sent: Thursday, July 19, 2018 4:35 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: FW: questions

Good afternoon Justina~

Don't mean to be a bother. Just wondering if, by chance, you responded directly to Steven Cook. (b) (6)

so I'm not sure if I missed something. Thank you!

Kecia

From: Thornton, Kecia

Sent: Wednesday, July 18, 2018 11:37 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: questions

Good morning Justina!

I hope you are well. I wanted to get your counsel on a couple of questions that have come my way. Steven Cook is traveling on Monday to do a site visit at a RCRA facility. The Duke Energy folks have offered to pick him up at the airport, so they can go do the site visit. Is that ok? Second question, Duke Energy is providing box lunches to have during the site visit. We believe the cost is about \$15 or less, but can confirm if needed. Can he accept the lunch or should he offer to pay?

Thank you for any advice you can offer. Take care!

Kecia

(202) 566-1913

From: [Fugh, Justina](#)
To: [Cook, Steven](#)
Cc: [Griffo, Shannon](#); [Thornton, Kecia](#); [Brooks, Becky](#); [Hilosky, Nick](#)
Subject: Recusal applies to A.Schulman Inc.
Date: Tuesday, December 04, 2018 7:05:00 PM
Attachments: [signed recusal 4-20-18.pdf](#)

Hi there,

We understand that your former employer, LyondellBasell, completed its acquisition of A. Schulman, Inc., in August 2018. Please know that you must recuse from participation in any specific party matter, including superfund sites, at which A. Schulman is a party or represents a party. We could revise your recusal statement, or you could rely on your screeners, Becky Brooks and Nick Hilosky, to ensure you do not participate in the Old Mill (Rock Creek, OH) or New Lyme Landfill (New Lyme, OH) matters. Just let me know what you would like to do. One other thing: I received a copy of the email message below in which a LyondellBasell employee has written to you at your EPA email address, indicating that you saw each other earlier in the day. Can you provide a more full explanation of how and where you encountered one another? I just want to be sure I understand why she wrote to you and how to harmonize that email with your recusal statement.

Thanks,

Justina

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-----Original Message-----

From: Solmer Stine, Julie S <Julie.SolmerStine@lyondellbasell.com>

Sent: Thursday, November 29, 2018 12:20 PM

To: Cook, Steven <cook.steven@epa.gov>

Subject: A. Schulman - Superfund sites

Steven,

It was great to see you this morning. Per our discussion I'm sending along the names of the Superfund sites I recently became aware of that A. Schulman is involved in.

Old Mill - Rock Creek, OH

New Lyme Landfill - New Lyme, OH

Premix, Inc. is the A. Schulman predecessor that is a PRP at each site.

Best regards,

Julie

Julie Solmer Stine

Lead Counsel - HSE

LyondellBasell

(b) (6) (mobile)

julie.solmerstine@lyb.com

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460


APR 20 2018

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

NOW THE
OFFICE OF LAND AND
EMERGENCY MANAGEMENT

MEMORANDUM

SUBJECT: Recusal Statement

FROM: Steven Cook 
Deputy Assistant Administrator

TO: Barry N. Breen
Acting Assistant Administrator

I have previously consulted with the Office of General Counsel/Ethics (OGC/Ethics) and been advised about my ethics obligations. This memorandum formally notifies you of my continuing obligation to recuse myself from participating personally and substantially in certain matters in which I have a financial interest, or a personal or business relationship. I also understand that I have obligations pursuant to Executive Order 13770 and the Trump Ethics Pledge that I signed, as well as my own bar obligations.

FINANCIAL CONFLICTS OF INTEREST

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I have consulted with OGC/Ethics and been advised that I do not currently have any financial conflicts of interest. I will remain vigilant and notify OGC/Ethics immediately should my financial situation change.

OBLIGATIONS UNDER EXECUTIVE ORDER 13770

Pursuant to Section 1, Paragraph 6 of the Executive Order, I understand that I am prohibited from participating in any particular matter involving specific parties in which my former employer, **LyondellBasell Industries N.V.**, is a party or represents a party. I understand that my recusal lasts for two years from the date that I joined federal service.

I have been advised by OGC/Ethics that, for the purposes of this pledge obligation, the term “particular matters involving specific parties” is broadened to include any meetings or other communication relating to the performance of my official duties, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties. I am further advised that the term “open to all interested parties” means five or more parties who represent a diversity of interests.

ATTORNEY BAR OBLIGATIONS

Pursuant to my obligations under my bar rules, I recognize that I am obliged to protect the confidences of my former clients. I also understand that I cannot participate in any matter that is the same as or substantially related to the same specific party matter that I participated in personally and substantially, unless my bar provides for and I first obtain informed consent and notify OGC/Ethics.

SCREENING ARRANGEMENT

In order to ensure that I do not participate in matters related to the entity above, I will instruct Becky Brooks or Nick Hilosky, Special Assistants, to assist in screening EPA matters directed to my attention that involve LyondellBasell Industries N.V. All inquiries and comments involving LyondellBasell Industries N.V. should be directed to Becky Brooks or Nick Hilosky without my knowledge or involvement until after my recusal period ends.

If Becky Brooks or Nick Hilosky determines that a particular matter will directly involve LyondellBasell Industries N.V., then she/he will refer it for action or assignment to another, without my knowledge or involvement. In the event that she/he is unsure whether an issue is a particular matter from which I am recused, then she/he will consult with OGC/Ethics for a determination. I will provide a copy of this memorandum to my principal subordinates with a copy to Justina Fugh, Senior Counsel for Ethics.

UPDATE AS NECESSARY

In consultation with OGC/Ethics, I will revise and update my recusal statement whenever warranted by changed circumstances, including changes in my financial interests, changes in my personal or business relationships, or any changes to my EPA duties. In the event of any changes to my screening arrangement, I will provide a copy of the revised recusal statement to you and to OGC/Ethics.

cc: Justina Fugh, Senior Counsel for Ethics

From: [Cook, Steven](#)
To: [Fugh, Justina](#)
Cc: [Griffo, Shannon](#); [Thornton, Kecia](#); [Brooks, Becky](#); [Hilosky, Nick](#)
Subject: RE: Recusal applies to A.Schulman Inc.
Date: Wednesday, December 05, 2018 12:22:47 AM

Justina -

Thanks for the review. One question on the recusal – for what time period is it applicable?

As to the meeting - I was speaking at CEEC, and the company is one of approximately 25 members. I counted at least a dozen different entities in attendance at the meeting. Susan Bodine spoke to the same group the day before.

Steven

From: Fugh, Justina
Sent: Tuesday, December 4, 2018 7:06 PM
To: Cook, Steven <cook.steven@epa.gov>
Cc: Griffo, Shannon <Griffo.Shannon@epa.gov>; Thornton, Kecia <Thornton.Kecia@epa.gov>; Brooks, Becky <Brooks.Becky@epa.gov>; Hilosky, Nick <Hilosky.Nick@epa.gov>
Subject: Recusal applies to A.Schulman Inc.

Hi there,

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Thanks,

Justina


Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

-----Original Message-----

From: Solmer Stine, Julie S <Julie.SolmerStine@lyondellbasell.com>
Sent: Thursday, November 29, 2018 12:20 PM
To: Cook, Steven <cook.steven@epa.gov>
Subject: A. Schulman - Superfund sites

Steven,

It was great to see you this morning. Per our discussion I'm sending along the names of the Superfund sites I recently became aware of that A. Schulman is involved in.



Old Mill - Rock Creek, OH

New Lyme Landfill - New Lyme, OH

Premix, Inc. is the A. Schulman predecessor that is a PRP at each site.

Best regards,

Julie

Julie Solmer Stine

Lead Counsel - HSE

LyondellBasell

(b) (6) (mobile)

julie.solmerstine@lyb.com

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From: [Keith, Jennie](#)
To: [Simon, Nigel](#); [ethics](#)
Cc: [Fugh, Justina](#); [Brooks, Becky](#); [Hilosky, Nick](#); [Thornton, Kecia](#)
Subject: RE: STEVEN COOK (TRAVEL START DATE – AUG 22nd)
Date: Tuesday, August 21, 2018 11:05:00 PM

Evening,
OGC/Ethics approves this form and will process it at a later date.
Thanks!
Jennie for OGC/Ethics

From: Simon, Nigel
Sent: Friday, August 17, 2018 5:06 PM
To: ethics <ethics@epa.gov>
Cc: Keith, Jennie <Keith.Jennie@epa.gov>; Fugh, Justina <Fugh.Justina@epa.gov>; Brooks, Becky <Brooks.Becky@epa.gov>; Hilosky, Nick <Hilosky.Nick@epa.gov>; Thornton, Kecia <Thornton.Kecia@epa.gov>
Subject: STEVEN COOK (TRAVEL START DATE – AUG 22nd)
Please see attached. The trip was cancelled and rescheduled to this Wednesday, Aug 22nd.
Thanks,
Nigel

From: [Keith, Jennie](#)
To: [Thornton, Kecia](#)
Subject: RE: Thank you for the training and questions about two event requests
Date: Monday, February 04, 2019 1:23:00 PM

Kecia,

You're correct on everything.

So, if they offer complimentary registration, and all participants can partake in the meals/reception, then he could attend the whole day (and even attend the reception, too, if he stayed that long and it was open to everyone).

In my review, I didn't see any issues. (b) (5)

Thanks!

Jennie for OGC/Ethics

From: Thornton, Kecia
Sent: Monday, February 04, 2019 9:39 AM
To: Keith, Jennie <Keith.Jennie@epa.gov>
Subject: FW: Thank you for the training and questions about two event requests

Good morning, Jennie!

I hope all is well and welcome back from the extended furlough. I wanted to follow up with you on an event request for Steven Cook that is taking place in March.

Steven Cook has been invited to speak at the 2019 USWAG CCR Workshop in Crystal City in March 2019. The workshop has been held annually for the past four years. There are approximately 200 participants that gather for a discussion of issues associated with CCR management and compliance with the 2015 rule. Attached is the agenda from the 2018 workshop.

They would like to include Steven on the program to make a presentation on where the rulemaking stands, what issues EPA is concerned with, etc. They are asking for him to be the opening speaker after introductions, from 8:30 to 9 AM on Wednesday, March 20th.

From what I could find, this is not a federally registered lobbyist. Below is a little more information about USWAG:

About Utility Solid Waste Activities Group (USWAG)

USWAG is responsible for addressing solid and hazardous waste issues on behalf of the utility industry. USWAG was formed in 1978, and is a trade association of over 110 utility operating companies, energy companies and industry associations, including the Edison Electric Institute (EEI), the National Rural Electric Cooperative Association (NRECA), the American Public Power Association (APPA), and the American Gas Association (AGA).

USWAG engages in regulatory advocacy pertaining to RCRA, TSCA, and HMTA. USWAG's mission is to address the regulation of utility wastes, byproducts and materials in a manner that protects human health and the environment and is consistent with the business needs of its members. The major policy-making body of USWAG is its Policy Committee, comprised of one representative from each member company. The Policy Committee approves the USWAG Budget and sets the general direction of USWAG's efforts. The Steering Committee, comprised of elected members from the Policy Committee, acts as an advisory group to the Policy Committee.

The invitation does not mention anything about him being offered continental breakfast or lunch. I am guessing, based on what I think I heard in your training sessions, he would be permitted to speak and could partake in breakfast (but I'm not sure about lunch since he is so early on the agenda – but I think lunch too! Correct?)

Thanks so much, Jennie!

Kecia
OLEM
(202) 566-1913

From: [Fugh, Justina](#)
To: [Cook, Steven](#)
Subject: RE: Threshold for conflicts
Date: Thursday, March 22, 2018 10:49:00 PM

Sorry, I should have thought of mentioning that to you. Within the same sector, you can't own more than \$25K in one company and no more than \$50K in the same sector. (b) (6)

-----Original Message-----

From: Cook, Steven
Sent: Thursday, March 22, 2018 9:51 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Re: Threshold for conflicts

Ok. (b) (6)

Sent from my iPhone

> On Mar 22, 2018, at 8:49 AM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

>

> Correct, but you (b) (6)

>

> -----Original Message-----

> From: Cook, Steven
> Sent: Thursday, March 22, 2018 9:29 AM
> To: Fugh, Justina <Fugh.Justina@epa.gov>
> Subject: Re: Threshold for conflicts

>

> Okay so (b) (6)

(b) (6)

>

> Sent from my iPhone

>

>> On Mar 22, 2018, at 8:23 AM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

>>

>> Hi,

>> It's \$15,000 for working on a particular matter that involves that company as a specific party. If you own more than \$25,000 in any one company, then you can't work on a particular matter of general applicability that affects that company as a member of a class or sector.

>> Justina

>>

>> Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

>>

>>

>>

>>

>> -----Original Message-----

>> From: Cook, Steven
>> Sent: Wednesday, March 21, 2018 11:12 AM
>> To: Fugh, Justina <Fugh.Justina@epa.gov>
>> Subject: Threshold for conflicts

>>

>> What is the value of a company stock I can hold before it creates a potential conflict - is it \$25,000?

>>

>> Sent from my iPhone

From: [Fugh, Justina](#)
To: [Cook, Steven](#)
Subject: RE: your financial disclosure report
Date: Thursday, April 19, 2018 11:09:00 AM
Attachments: [Cook, Steve, new entrant report.pdf](#)

Hi there,

(b) (6)

Here's what your report looks like right now. When you confirm that you are okay with the latest changes, then I will certify your report. Woo hoo!

Justina

From: Cook, Steven
Sent: Wednesday, April 18, 2018 5:37 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: your financial disclosure report

(b) (6)

From: Fugh, Justina
Sent: Wednesday, April 18, 2018 9:12 AM
To: Cook, Steven <cook.steven@epa.gov>
Subject: RE: your financial disclosure report

And I see that you made the changes in INTEGRITY already. (b) (6)

When you get them, just send the names to me in an email and I'll enter them for you.

Cheers,

Justina

Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North William Jefferson Clinton Federal Building | Washington DC 20460 (for ground deliveries use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Cook, Steven
Sent: Wednesday, April 18, 2018 8:14 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: your financial disclosure report

(b) (6)

From: Cook, Steven

Sent: Tuesday, April 17, 2018 6:42 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: your financial disclosure report

Justina – thanks for the response. Responses below in red. I will hit the submit button.

Thanks.

Steven

From: Fugh, Justina
Sent: Tuesday, April 17, 2018 6:11 PM
To: Cook, Steven <cook.steven@epa.gov>
Subject: RE: your financial disclosure report

Hi there,

We are getting closer ...! Here's what's left ...

- (b) (6)

- I can't see where to put a brief description of my duties.

JUSTINA: Part 4, (b) (6)

Steven: I was looking in Part 1. Sorry about that. This description is accurate.

- (b) (6)

- (b) (6)

JUSTINA: got it!

Steven: Great.

Now for the hard part: you still have the report logged in to you so I can't make any changes. To send it to me, open the wretched thing again, then look at the left hand menu. Scroll down to "submit report" and click on that. Wait for the page to load, then scroll down to get to the attestation paragraph. Say yes or whatever it wants, then hit the submit button. That should do it!

Cheers,

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From: Cook, Steven

Sent: Tuesday, April 17, 2018 9:20 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: your financial disclosure report

Justina – thanks for the careful review. I just have one question (see #4) – once I find that spot and review I will send it back in. Below are my responses/comments:

(b) (6)

4. I can't see where to put a brief description of my duties.

(b) (6)

7. Thanks

From: Fugh, Justina

Sent: Friday, April 13, 2018 1:11 PM

To: Cook, Steven <cook.steven@epa.gov>

Subject: your financial disclosure report

Hi there,

Well, it's been a busy few weeks for us, but I finally have a few moments to do some much needed ethics housekeeping. I'd like to finalize my review of your financial disclosure report, but had a few questions for you. To that end, I'm sending your report back to you, but here are the comments I've made.

Also, Shannon Griffo drafted your recusal statement for me, so I need to find that (b) (6) ! and send to you. I'm on it! Let me know if you need any help with your report.

Justina

Comments of Reviewing Officials (not publicly displayed on report):

PART	#	REFERENCE	COMMENT
1.	1	(b) (6)	

(b) (6)

[illegible]

From: [Cook, Steven](#)
To: [Fugh, Justina](#)
Subject: RE: your financial disclosure report
Date: Wednesday, April 18, 2018 9:13:41 AM

(b) (6)

From: Fugh, Justina

Sent: Wednesday, April 18, 2018 9:12 AM

To: Cook, Steven <cook.steven@epa.gov>

Subject: RE: your financial disclosure report

And I see that you made the changes in INTEGRITY already. (b) (6)

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Cheers,

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Subject: RE: your financial disclosure report

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- (b) (6)
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		(b) (6)	

■	■	(b) (6)	[REDACTED]
■	■	[REDACTED]	[REDACTED]
■	■	[REDACTED]	[REDACTED]
■	■	[REDACTED]	[REDACTED]

From: [Cook, Steven](#)
To: [Fugh, Justina](#)
Subject: RE: your financial disclosure report
Date: Thursday, April 19, 2018 11:39:42 AM

I believe we are indeed done. Thanks for all the help.

From: Fugh, Justina
Sent: Thursday, April 19, 2018 11:10 AM
To: Cook, Steven <cook.steven@epa.gov>
Subject: RE: your financial disclosure report

Hi there,

(b) (6)

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Justina Fugh | Senior Counsel for Ethics | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North William Jefferson Clinton Federal Building | Washington DC 20460 (for ground deliveries use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Cook, Steven

Sent: Tuesday, April 17, 2018 9:20 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: your financial disclosure report

Justina – thanks for the careful review. I just have one question (see #4) – once I find that spot and review I will send it back in. Below are my responses/comments:

(b) (6)

4. I can't see where to put a brief description of my duties.

(b) (6)

7. Thanks

From: Fugh, Justina

Sent: Friday, April 13, 2018 1:11 PM

To: Cook, Steven <cook.steven@epa.gov>

Subject: your financial disclosure report

Hi there,

Well, it's been a busy few weeks for us, but I finally have a few moments to do some much needed ethics housekeeping. I'd like to finalize my review of your financial disclosure report, but had a few questions for you. To that end, I'm sending your report back to you, but here are the comments I've made.

Also, Shannon Griffo drafted your recusal statement for me, so I need to find that (b) (6) ! and send to you. I'm on it! Let me know if you need any help with your report.

Justina

Comments of Reviewing Officials (not publicly displayed on report):

PART	#	REFERENCE	COMMENT
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[Redacted]

■ ■ (b) (6) [Redacted]
[Redacted]

■ ■ [Redacted] [Redacted]

■ ■ [Redacted] [Redacted]

■ ■ [Redacted] [Redacted]

■ ■ [Redacted] [Redacted]

■ ■ [Redacted] [Redacted]

■ ■ [Redacted] [Redacted]

From: [Fugh, Justina](#)
To: [Cook, Steven](#)
Subject: RE: your financial disclosure report
Date: Tuesday, April 17, 2018 6:49:00 PM

Then please also say hello to my wonderful Barry!

From: Cook, Steven

Sent: Tuesday, April 17, 2018 6:45 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: your financial disclosure report

I will – also I am talking to Barry tomorrow about the “screener” in the recusal letter.

From: Fugh, Justina

Sent: Tuesday, April 17, 2018 6:44 PM

To: Cook, Steven <cook.steven@epa.gov>

Subject: RE: your financial disclosure report

Say hello to your wonderful wife for me!

From: Cook, Steven

Sent: Tuesday, April 17, 2018 6:42 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: your financial disclosure report

Justina – thanks for the response. Responses below in red. I will hit the submit button.

Thanks.

Steven

From: Fugh, Justina

Sent: Tuesday, April 17, 2018 6:11 PM

To: Cook, Steven <cook.steven@epa.gov>

Subject: RE: your financial disclosure report

Hi there,

We are getting closer ...! Here's what's left ...

- (b) (6)
[REDACTED]
- I can't see where to put a brief description of my duties.
JUSTINA: Part 4, (b) (6)
[REDACTED]
Steven: I was looking in Part 1. Sorry about that. This description is accurate.
- (b) (6)
[REDACTED]
- (b) (6)
[REDACTED]

JUSTINA: got it!

Steven: Great.

Now for the hard part: you still have the report logged in to you so I can't make any changes. To send it to me, open the wretched thing again, then look at the left hand menu. Scroll down to “submit report” and click on that. Wait for the page to load, then scroll down to get to the attestation paragraph. Say yes or whatever it wants, then hit the submit button. That should do it!

Cheers,

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Jefferson Clinton Federal Building | Washington DC 20460 (for ground deliveries use 20004 for the zip code) | phone 202-564-1786
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Justina – thanks for the careful review. I just have one question (see #4) – once I find that spot and review I will send it back

[REDACTED]

Comments of Reviewing Officials (not publicly displayed on report):

PART	#	REFERENCE	COMMENT
[REDACTED]	[REDACTED]	(b) (6) [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

		(b) (6)	
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From: [Fugh, Justina](#)
To: [Cook, Steven](#)
Subject: recusal statement for you to consider
Date: Friday, April 13, 2018 1:21:00 PM
Attachments: [Steven Cook Draft Recusal 4 11 18.docx](#)

Found it! (b) (5)

and then print this
out on letterhead, sign and date. I'd like a copy for my files here, please.

Happy Friday!

justina

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ETHICS PLEDGE

As a condition, and in consideration, of my employment in the United States Government in an appointee position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. I will not, within 5 years after the termination of my employment as an appointee in any executive agency in which I am appointed to serve, engage in lobbying activities with respect to that agency.
2. If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, I agree that I will abide by those restrictions.
3. In addition to abiding by the limitations of paragraphs 1 and 2, I also agree, upon leaving Government service, not to engage in lobbying activities with respect to any covered executive branch official or non-career Senior Executive Service appointee for the remainder of the Administration.
4. I will not, at any time after the termination of my employment in the United States Government, engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2017, would require me to register under the Foreign Agents Registration Act of 1938, as amended.
5. I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
6. I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
7. If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.
8. I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Appointees," issued by the President on January 28, 2017, which I have read before signing this document, defines certain terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the obligations of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Government service.


Signature

Feb 23, 2018
Date

Cook, STEVEN DURAND
Print or type your full name (last, first, middle)